



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

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May 3, 2017

Mr. Mark Troiano
Troiano Trucking, Inc.
109 Creeper Hill Road
North Grafton, MA 01536

RE: Grafton
Transmittal No.: X272179
Application No.: CE-16-028
Class: *SM-50*
FMF No.: 348652
AIR QUALITY PLAN APPROVAL

Dear Mr. Troiano:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste, has reviewed your Non-major Comprehensive Plan Application ("Application") listed above. This Application concerns the proposed construction and operation of an animal feed dehydrator process at your facility located at 109 Creeper Hill Road in Grafton, Massachusetts ("Facility"). The Application bears the seal and signature of Michael T. Lannan, Massachusetts Registered Professional Engineer Number 45607.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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1. DESCRIPTION OF FACILITY AND APPLICATION

A. HISTORY AND DESCRIPTION OF OPERATIONS

Troiano Trucking, Inc. (the Permittee) operates a food waste recycling business at the Facility and has received various permits from MassDEP, Division of Solid Waste. On August 6, 2015, MassDEP issued an RCC Permit Transmittal No. (Tr) X259964 to the Permittee for a proposed new food conversion project limited to 375 tons per day and 136,875 tons per year. On November 22, 2016, MassDEP received the present Plan Application Transmittal No. X272179 to apply for an Air Quality Plan Approval for the same food conversion project. The Permittee proposes to construct and operate a facility that will take organic materials, restaurant plate scraping, and will combine it with unwanted, “off-spec” food, previously approved for human consumption. The food will be collected from numerous places, including large restaurants and institutions, food manufacturing companies and bakeries. The unwanted food will be processed into a pelletized animal feed ingredient to be sold to livestock, poultry, swine and agriculture industries.

B. PROJECT DESCRIPTION

The incoming unwanted food will be segregated into “wet” and “dry” food streams. The “dry” food stream will consist primarily of waste baked goods, and the “wet” stream will include all other waste foods. The wet and dry food will be received and stored in different containers. Next the different wet and dry foods will be blended together into a pumpable slurry. Besides the waste foods, some purchased grain materials will be blended into the mix to achieve the desired properties. After blending, the mix will be formed into moist pellets by extrusion in the pelletizer.

The moist pellets will be dried in a fluidized bed dryer, designated as emission unit (EU)1. The air to the dryer will be heated by three natural gas fired burners rated at 10,000,000 Btu per hour each. The total air flow will be 75,000 cubic feet per minute (cfm). Moist air exiting the dryer will flow through three separate ducts, each one leading to a cyclone to remove entrained particulate matter (PM) from the exhaust. The collected PM is returned to the process to form the pellets. The gas-fired dryers generate products of combustion which include emissions of nitrogen oxides (NO_x) and carbon monoxide (CO).

The dried pellets will pass through a conditioner to hold the pellets at the required temperature and time for pasteurization, and then through a pellet cooler (EU2). The pellet cooler will have ambient temperature air blowing at 25,000 cfm through the pellets to cool them. Exhaust from the cooler will flow through a duct to a cyclone to remove PM, which is returned to the process.

The storage silos for the grain ingredients mentioned above have the potential to generate fugitive dust (PM) emissions during filling. The dust will be captured and vented to a dust collector with an estimated 90% control efficiency. The silos are designated as EU3.

The cooled pellets will be stored in a silo and then loaded into trucks (EU4). Because of the potential for fugitive dust from the hatches of the truck during loading, the dust will be captured (estimated 90% capture efficiency) and vented to a dust collector with an estimated 99% control efficiency.

The incoming unwanted food materials, especially the “wet” foods are subject to decay and therefore have the potential to release compounds causing odor. To address the need for odor control, the Permittee drafted an odor control plan for the project during Solid Waste permitting. The Permittee has also recently provided more details on the steps necessary to control odors. Odors will be controlled as follows:

1. The fraction of incoming unwanted food that is animal-derived (fish, poultry and/or cooked meats) will be kept low, estimated at 5%.
2. The incoming wet foods will be processed as quickly as possible, within one day of receipt.
3. All equipment that has been in contact with wet food material will be cleaned frequently so that food residues will not accumulate and decay.
4. If necessary, the Permittee will install odor control on the exhaust air streams from the four main process vents (the three cyclones serving the dryer and the cyclone serving the pellet cooler).
5. In addition, a carbon adsorption system on the material receiving and process side can also be evaluated, if nuisance conditions were to arise that would be specific to receiving odors.

The building has been sized for two processing lines. This current Plan Approval only considers one line. This current line is to be installed in a manner so that it takes up approximately 50% of the available floor space within the building. The remaining space is set aside for a potential future train. Any future train will require another air permitting process prior to installation. In the interim, prior to any additional permitting or until such time that that MassDEP agrees in writing that additional odor control is not necessary, this space will be left open and available in case there is a need for an add-on odor control technology. With a space of up to one half of the new processing building, a number of different types of potential odor control technologies can be accommodated, if needed.

The approved project is limited to receiving 375 tons per day of unwanted food pursuant to the RCC Permit. However, the Facility is capable of processing up to 480 tons per day. Under this Plan Approval Tr X272179, the Permittee may accept up to 375 tons per day, provided that if the Division of Solid Waste allows up to 480 tons per day at a later date, then the Permittee may accept up to 480 tons per day under this Plan Approval Tr X272179.

C. APPLICABLE REGULATORY REQUIREMENTS

State Requirements

a) BACT

310 CMR 7.02(8) requires Best Available Control Technology (BACT) for Plan Approvals. MassDEP has determined that the Table 2 PM emission limits for the EU1 and EU2 dryer and cooler exhausts represent BACT for PM, achieved by cyclones which will remove PM from the process exhausts. The NO_x and CO emission limits on the EU1 and EU2 exhausts will be achieved in the dryer air heaters by using low-NO_x burners with good combustion practice. The amount of VOC driven off in the drying process is expected to be low, and the Table 2 emission rate represents BACT for this process. The fugitive PM emissions from the EU3 and EU4 silos and truck loading are intermittent and relatively low tonnage, and represent BACT for this application.

b) Air Dispersion Modeling

The Permittee conducted air dispersion modeling to demonstrate that the predicted air quality impacts will comply with the National Ambient Air Quality Standards (NAAQS). MassDEP reviewed the air quality analysis, and found that these results are fully compliant with the criteria pollutant NAAQS.

c) Sound Monitoring and Modeling Study

The Facility will use many different pieces of machinery which will produce sound at levels loud enough to cause noise if not mitigated. The Permittee proposes to mitigate the sound levels by installing silencers in the air streams exiting the dryer and cooler blowers, installing appropriate sound deadening materials in the walls and roof of the building, and keeping building garage doors closed except during deliveries of materials and as necessary for equipment maintenance.

The Permittee conducted background sound level monitoring and established ambient sound levels at locations of interest based on these measurements and MassDEP guidance. The Permittee then calculated or modeled predicted sound impacts from measured ambient sound levels and project sound emissions. Table A summarizes the predicted sound levels at the following locations as described in the Application.

Table A				
Sound Modeling Locations	Lowest Background Sound Level (L₉₀, dBA	Predicted Maximum Sound Level from Facility (dBA)	Total Predicted sound Level (dBA)	Predicted Sound Level Change (dBA)
Location 1	42.8	45.0	47.0	+4.2
Location 2	41.6	29.8	41.9	+0.3
Location 3	38.6	33.8	39.8	+1.2
Location 4	39.9	34.4	41.0	+1.1
Location 5	38.4	31.6	39.2	+0.8

Based on review of the engineering design of the Facility including sound mitigation measures and predicted facility sound level impacts, MassDEP has determined that the design incorporates sound suppression and sound transmission prevention elements that constitute necessary equipment, service and maintenance, and other necessary precautions to prevent unnecessary sound emissions, as required by 310 CMR 7.10.

After the approved Facility commences operation, the Permittee shall conduct a sound survey (Table 3, Condition 8). The sound survey shall be performed in accordance with a protocol reviewed and approved by MassDEP in accordance with Table 5, Condition 5.

Federal Requirements

The Facility is not subject to any regulations under 40 CFR Part 60, 61, or 63.

2. EMISSION UNIT IDENTIFICATION

Each Emission Unit (“EU”) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU	Description	Design Capacity	Pollution Control Device (PCD)
1	Feed Dehydrator	20 tons per hour	3 Cyclones
2	Feed Pellet Cooler	20 tons per hour	Cyclone
3	Silos	N/A	Dust Collector
4	Truck Loading	N/A	Dust Collector

Table 1 Key:

EU = Emission Unit

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit^{1,2}
1	375 tons per day food waste ¹	NO _x	3.1 lb/hr, 13.4 tpy
		CO	9.8 lb/hr, 43.1 tpy
		PM ₁₀	0.8 lb/hr, 3.5 tpy
		PM _{2.5}	0.5 lb/hr, 2.4 tpy
		SO ₂	3.9 lb/hr, 0.09 tpy
		VOC	0.3 lb/hr, 1.3 tpy
2		PM ₁₀	2.0 lb/hr, 8.7 tpy
		PM _{2.5}	1.9 lb/hr, 8.4 tpy
3		PM ₁₀	0.08 lb/hr, 0.35 tpy
		PM _{2.5}	0.01 lb/hr, 0.03 tpy
4		PM ₁₀	0.145 lb/hr, 0.13 tpy
		PM _{2.5}	0.03 lb/hr, 0.02 tpy
Facility- wide		NO _x	13.4 tpy
		CO	43.1 tpy
		PM ₁₀	12.7 tpy
		PM _{2.5}	10.8 tpy
		SO ₂	0.094 tpy
		VOC	3.6 tpy

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit^{1,2}
Facility-wide		Odor	The Facility shall not cause a condition of air pollution due to odors ³

Table 2 Key:

EU = Emission Unit

NO_x = Nitrogen Oxides

CO = Carbon Monoxide

SO₂ = Sulfur Dioxide

PM₁₀ = Particulate Matter less than or equal to 10 microns in diameter

tpy = tons per consecutive 12-month period

PM_{2.5} = Particulate Matter less than or equal to 2.5 microns in diameter (includes filterable)

VOC = Volatile Organic Compounds

Table 2 Notes

1. The emission limits are calculated on the basis of up to 480 tons per day of unwanted food, but the Facility is limited to 375 tons per day under the RCC Permit. If in the future MassDEP issues a revised RCC Permit that allows up to 480 tons per day, then this Plan Approval also will allow 480 tons per day.
2. The Permittee shall calculate emissions using the emission factors presented in the Application, unless those emission factors are superseded by new emission factors determined on the basis of stack testing.
3. The Permittee shall comply with the odor requirements specified in Table 6, Conditions 1.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3	
EU	Monitoring and Testing Requirements
1	1. The Permittee shall monitor the natural gas usage in the EU1 dehydrator heaters in order to calculate the emissions from fuel burning.
1, 2	2. The Permittee shall monitor the cyclones in accordance with manufacturer's specifications to ensure proper functioning to remove particulate matter.

Table 3	
EU	Monitoring and Testing Requirements
1,2	3. For compliance testing purposes, the Permittee shall construct EU1 and EU2 so as to accommodate the emissions testing requirements of 310 CMR 7.13 and procedures of 40 CFR Part 60, Appendix A and 40 CFR 60.4244. The two (2) outlet sampling ports shall be located at a minimum of one-half duct diameters upstream and two duct diameters downstream of any flow disturbance. The corresponding sampling ports shall be 90 degrees apart from each other. Any variation in sampling port position requires MassDEP approval.
1,2	4. The Permittee shall conduct emissions testing on the cyclone stacks to demonstrate compliance with the Table 2 emission limits for PM ₁₀ and PM _{2.5} within 180 days of the commencement of continuous operation of the Facility. All compliance testing shall be conducted using the test methods and procedures detailed in 40 CFR §60.4244 and 40 CFR Part 60 Appendix A (Methods 5, 201 and 202). All compliance testing shall be scheduled with MassDEP personnel at a mutually agreeable date and time.
1, 2, 3, 4	5. The Permittee shall monitor the weight of material processed through each EU in order to calculate the PM ₁₀ and PM _{2.5} emissions from material processing.
Facility-wide	6. The Permittee shall monitor incoming materials and keep a daily log as required by the RCC Permit, noting the types of materials received, etc. and shall especially note what types and amounts of raw fish, poultry, and/or other highly putrescible materials are received.
	7. During the first three months after start-up, the Permittee shall monitor odor on-site and off-site via the odor intensity scale per ASTM E544. The Permittee shall use a five point n-butanol scale per the method. The Permittee shall submit an odor monitoring plan to MassDEP for approval prior to final start-up that will discuss the specifics of this initial odor monitoring plan.
	8. The Permittee shall conduct a sound survey during daytime and nighttime operations in accordance with a MassDEP-approved protocol. The survey shall be conducted within 60 days of the commencement of continuous operation of the Facility. The Permittee shall work in full cooperation with MassDEP if the sound survey results deviate from the predicted sound levels specified in this Plan Approval. The reason for the deviation shall be investigated and changes shall be implemented to remediate any excess sound being generated. MassDEP shall be notified in advance of any physical changes at the Facility to reduce sound, and of the times any sound measurements will be made to determine the effect of the changes made.
	9. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	10. If and when MassDEP requires it, the Permittee shall conduct additional emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

Table 3 Key:

EU = Emission Unit
USEPA = United States Environmental Protection Agency

CMR = Code of Massachusetts Regulations
ASTM = American Society for Testing and Materials

PM = Total Particulate Matter

PM₁₀ = Particulate Matter less than or equal to 10 microns in diameter

PM_{2.5} = Particulate Matter less than or equal to 2.5 microns in diameter (includes filterable)

Table 4	
EU	Record Keeping Requirements
1	1. To document actual emissions of the air contaminants listed in Table 2 above, the Permittee shall keep records, for all burners, the daily, monthly, and twelve month rolling gas consumption (scf).
1, 2	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
1, 2, 3, 4	3. To document actual emissions of the air contaminants listed in Table 2 above, the Permittee shall keep records, for each material handling EU, the daily, monthly, and twelve month rolling total of material processed through each EU.
	4. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping .
Facility-wide	5. The Permittee shall keep records of the daily logs of materials received as required by the RCC Permit and noted in Table 3, Condition 6.
	6. The Permittee shall keep records of the odor monitoring done as described in Table 3, Condition 7.
	7. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCDs approved herein on-site.
	8. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	9. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	10. The Permittee shall keep at the Facility a record of employee training and a certification by the Permittee that each employee has been trained and is knowledgeable regarding the requirements of the RCC Permit, as specified in the RCC Permit.

Table 4	
EU	Record Keeping Requirements
Facility-wide	11. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	12. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	13. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU = Emission Unit
SOMP = Standard Operating and Maintenance
Procedure

PCD = Pollution Control Device
USEPA = United States Environmental Protection
Agency

Table 5	
EU	Reporting Requirements
Facility-wide	1. The Permittee shall provide MassDEP, Air Quality Permitting Section, with a copy of the monthly summary required to be written under the RCC Permit in order to generate the annual report of materials received. The reports shall particularly note the quantities of raw poultry, fish, and other highly putrescible materials received. Report shall be due by the 15 th of each month following 90 days of operation. The purpose of the reports is to provide data for MassDEP to correlate feedstock composition with offsite odors (if any) generated by the Facility. The Permittee may discontinue sending these reports when notified by MassDEP that they are no longer required to be sent.
	2. The Permittee shall send MassDEP records of odor complaints received and what action was taken as a result of the complaints. The Permittee shall start sending these records on a weekly basis, Monday of every week, immediately after the Facility starts continuous production. MassDEP may alter the required reporting frequency at its discretion.
	3. The Permittee shall submit a compliance emission test protocol to MassDEP's Central Regional Office for review and approval at least 30 days prior to the scheduled commencement of said testing.
	4. The Permittee shall submit an emission test report to MassDEP's Central Regional Office for review within 60 days of the completion of any required compliance stack testing.
	5. The Permittee shall submit a sound survey protocol for the required initial compliance test to MassDEP's Central Regional Office for review and approval at least 30 days prior to the scheduled commencement of said survey.

Table 5	
EU	Reporting Requirements
Facility-wide	6. The Permittee shall submit the sound survey results to MassDEP's Central Regional Office, in writing, attention BAW Permit Chief, within 45 days of completion of the sound survey.
	7. The Permittee shall notify MassDEP's Central Regional Office, in writing, within 14 days of commencement of continuous operation of the Facility.
	8. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	9. The Permittee shall notify the Central Regional Office of MassDEP, BAW Permit Chief by telephone: 508-767-2845, email: CERO.Air@massmail.state.ma.us, or fax : 508-792-7621, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted Permit Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	10. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form.

Table 5 Key:

EU = Emission Unit

4. SPECIAL TERMS AND CONDITIONS

- A. The Permittee is subject to, and shall comply with, the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU	Special Terms and Conditions
Facility-wide	<p>1. In the event that nuisance conditions arise due to odor emissions from the Facility, the Permittee shall take whatever actions MassDEP requires to abate the odor emissions. Such actions may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> a. installing odor control equipment on the pellet dehydrator and pellet cooler exhaust stacks; b. installing odor control equipment on any process vents and/or building exhaust vents or any area within the building where it is necessary; c. installing a carbon adsorption system on the material receiving and process side; d. actions included in the Facility Odor Control Plan submitted as part of the RCC Application, including more frequent or thorough equipment cleaning, etc; e. actions included in the RCC Permit to address odor control, such as removing feedstock from tanks when necessary due to shutdown, etc.; f. changing feedstocks and/or process conditions in odor to reduce the potential to generate odor emissions.
	<p>2. The Permittee shall develop a SOMP for the whole Facility operation and maintenance within 90 days of startup of the Facility. The Permittee shall operate the Facility consistent with the SOMP. The SOMP shall include operating procedures for periods of start-up and shut-down. The Permittee shall maintain the SOMP onsite.</p>
	<p>3. The Permittee shall clean the Facility following the “SOP: Troiano Trucking – Animal Feed Dehydrator Facility Cleaning” submitted as part of the Application. This SOP shall be updated with information pertaining to specific process equipment when such information becomes available. The Permittee may take this SOP and make it part of the whole-facility SOMP required in Condition 2. above.</p>
	<p>4. The Permittee shall use the following noise mitigation measures in constructing the Facility:</p> <ul style="list-style-type: none"> a. Silencers on the discharges of the four process blowers; b. Materials in the roof and walls to attenuate sound transmission, as described in the Application. c. Keeping building garage doors closed except during deliveries of materials and as necessary for equipment maintenance.
	<p>5. Compliance with the conditions of this Plan Approval does not relieve the Permittee from the obligation to comply with 310 CMR 7.01 and 310 CMR 7.10 when operating the approved equipment or any other activities at the Facility.</p>
	<p>6. The Permittee shall set up a complaint hotline for neighborhood odor and noise complaints against the Facility as specified in the RCC Permit Odor Control Plan, and follow the Plan in response to odor and noise complaints, whenever complaints are received.</p>

Table 6	
EU	Special Terms and Conditions
Facility-wide	7. The Permittee shall train and periodically retrain all participants in the supply chain to ensure that raw meat and raw meat trimmings are not brought to the Facility, as specified in the RCC Permit.
	8. The Permittee shall provide and maintain an adequate number of trained staff at the Facility to ensure that the Facility is operated and maintained as designed, in accordance with good management practices, as specified in the RCC Permit.

Table 6 Key:

EU = Emission Unit
SOMP = Standard Operating and Maintenance
Procedure
ASTM = American Society for Testing and
Materials

SOP = Standard Operating Procedure
dBA = A-weighted decibels

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including, but not limited to, rain protection devices known as “shanty caps” and “egg beaters.”
- C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1 ¹	46.3	4	46	278
2	46.3	4	38	150
3	35	0.5	0.85	68
4	10	1.67	0.28	68

Table 7 Key:

EU = Emission Unit

°F = Degree Fahrenheit

Table 7 Notes:

Note 1: EU1 has three separate identical stacks.

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local laws or regulations now or in the future.
- F. The Application is incorporated into this Plan Approval by reference. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) and a completed Adjudicatory Hearing Fee Transmittal Form, a copy of which is attached hereto, must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Paul Dwiggins by telephone at 508-767-2760, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley
Permit Chief
Bureau of Air and Waste

Enclosures:

- Adjudicatory Hearing Fee Transmittal Form
- Stamped Plan Application

ecc: Grafton Board of Health
Grafton Fire Department
MassDEP/Boston - Yi Tian
Tech Environmental